

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS**

CATHERINE ALEXANDER,

Plaintiff,

vs.

TAKE-TWO INTERACTIVE SOFTWARE,
INC.; 2K GAMES, INC.; 2K SPORTS INC.;
WORLD WRESTLING ENTERTAINMENT,
INC.; VISUAL CONCEPTS
ENTERTAINMENT; YUKE'S CO., LTD.;
YUKES LA INC.,

Defendants.

Case No. 3:18-cv-00966-MJR-DGW

**WORLD WRESTLING ENTERTAINMENT, INC.'S MOTION TO DISMISS
FIRST AMENDED COMPLAINT FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, Defendant World Wrestling Entertainment, Inc. ("WWE") hereby moves this Court to dismiss all claims asserted against WWE in Plaintiff's First Amended Complaint for lack of personal jurisdiction over WWE. In support of this Motion, WWE submits the accompanying Memorandum of Law and the Declaration of Edward M. Kiang.

WWE also moves to dismiss all claims asserted in Plaintiff's First Amended Complaint for failure to state a claim pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for the reasons set forth in the Memorandum of Law in Support of Defendants Take-Two Interactive Software, Inc., 2K Games, Inc., 2K Sports, Inc., Visual Concepts Entertainment, Yuke's Co., Ltd., and Yuke's LA, Inc.'s Motion to Dismiss Plaintiff's First Amended Complaint, which are adopted and incorporated by reference herein.

WHEREFORE, WWE respectfully requests that this Honorable Court grant WWE's Motion to Dismiss, dismiss all claims asserted against WWE in Plaintiff's First Amended Complaint with prejudice, and award WWE such other and further relief that this Court deems just and proper.

Dated: October 23, 2018

Respectfully submitted,

/s/ Curtis B. Krasik
Jerry S. McDevitt (pro hac vice)
Curtis B. Krasik (pro hac vice)
K&L GATES LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222
Phone: (412) 355-6500
Email: jerry.mcdevitt@klgates.com
Email: curtis.krasik@klgates.com

Michael J. Nester (49410)
DONOVAN ROSE NESTER P.C.
15 North 1st Street, Suite A
Belleville, Illinois 62220
Phone: (618) 212-6500
Email: mnester@drnpc.com

*Attorneys for Defendant World Wrestling
Entertainment, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2018, I electronically filed the foregoing Motion to Dismiss Plaintiff's First Amended Complaint for Lack of Personal Jurisdiction with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Anthony G. Simon	asimon@simonlawpc.com
Benjamin R. Askew	baskew@simonlawpc.com
Anthony R. Friedman	afriedman@simonlawpc.com
R. Seth Crompton	scrimpton@allfela.com

Attorneys for Plaintiff

Dale M. Cendali	dale.cendali@kirkland.com
Joshua L. Simmons	joshua.simmons@kirkland.com

Attorneys for Defendants 2K Games, Inc., 2K Sports, Inc., Take-Two Interactive Software, Inc., Visual Concepts Entertainment, Yuke's Co. Ltd., and Yuke's LA, Inc.

/s/ Curtis B. Krasik
Curtis B. Krasik (pro hac vice)
K&L GATES LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222
Phone: (412) 355-6500
Email: curtis.krasik@klgates.com

Attorney for Defendant World Wrestling Entertainment, Inc.